

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327  WAVE 12
<i>Juanita Barton, et al v. Ethicon LLC and Johnson &amp; Johnson</i> Case No. 2:13-cv-20332	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION  
TO EXCLUDE THE GENERAL OPINIONS OF DANIEL ELLIOTT, M.D.**

Plaintiffs, Juanita Barton and James Dean, file this response in opposition out of an abundance of caution. Plaintiffs designated Dr. Elliott as a general expert in the above-referenced case.

In response to Defendants' notice adopting their prior Motion to Exclude the Opinions and Testimony of Daniel Elliott, M.D. (Doc 8778 (adopting 8080 and 8081)). Plaintiffs hereby adopt and incorporate by reference their prior responsive briefing (Doc 2952 and 8247) in opposition to the motion to exclude his testimony. Plaintiffs respectfully request that the Defendants' motion be denied for the reasons stated in the prior briefing.

Dated: November 25, 2019

Respectfully Submitted,

/s/ Charles E. Soechting, Jr.

Charles E. Soechting, Jr.  
TX Bar No. 24044333  
SIMON GREENSTONE PANATIER LLC  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
Telephone: (214) 276-7680  
Facsimile: (214) 276-7699  
[csoechting@sgptrial.com](mailto:csoechting@sgptrial.com)

COUNSEL FOR PLAINTIFFS

**CERTIFICATION OF SERVICE**

I hereby certify that on November 25, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all CM/ECF participants.

*/s/ Charles E. Soechting, Jr.*  
Charles E. Soechting, Jr.